LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1650 TYSONS BOULEVARD SUITE 1500 MCLEAN, VA 22102 (703) 584-8678

> DIRECT DIAL (703) 584-8666

August 26, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Office of Managing Director Federal Communications Commission 445 12th Street, S.W. Room TW-B204 Washington, DC 20554

Attn: Wireline Competition Bureau

Re: RCC Minnesota, Inc. and RCC Atlantic, Inc.

Petition for Designation as an Eligible

Telecommunications Carrier in the State of New

Hampshire

Docket No. 96-45

Dear Madam Secretary:

On behalf of RCC Minnesota, Inc. and RCC Atlantic, Inc. ("RCC") this Supplement is submitted to make corrections and to provide the Commission with additional information concerning RCC's Petition for Designation as an Eligible Telecommunications Carrier in the State of New Hampshire ("Petition"). This information is provided in response to a recent telephone inquiry from Wireline Competition Bureau staff.

I. Correction of Exhibit D – Rural Wire Centers Requiring Redefinition

In its Petition, RCC requested that the service area of Granite State Telephone, Inc. ("Granite State") be redefined pursuant to 47 C.F.R. §

¹ See Public Notice, "Parties are Invited to Comment on Petitions for Eligible Telecommunications Carrier Designations, Pleading Cycle Established," DA 04-1445 (rel. May 21, 2004).

54.207(d) so that each wire center constitutes a separate service area. However, the corresponding exhibit also included wire centers served by Northland Telephone of Maine, Inc. ("Northland"), among the wire centers for which redefinition is requested. Redefinition is not necessary for the Northland areas in which RCC seeks ETC designation in New Hampshire, for two reasons.

First, RCC proposes to cover the entirety of Northland's service area in New Hampshire. Most of Northland's study area is in the state of Maine, and only two Northland wire centers extend into New Hampshire. Because no territory served by Northland in New Hampshire is excluded from the Petition, no redefinition is required.²

Second, RCC – which already had ETC status in portions of Maine at the time the Petition was filed – recently was granted additional ETC areas by the Maine Public Utilities Commission following RCC's acquisition of licenses enabling it to serve the remainder of the state. As a result, RCC's ETC service area now includes the entire state of Maine.³ Thus, RCC is an ETC in all areas of Northland's service territory except for the small portions located in New Hampshire. A grant of the Petition would complete the inclusion of Northland's service footprint within RCC's ETC service areas, eliminating the possibility of cream-skimming.⁴ Thus, no redefinition or cream-skimming analysis is required for areas served by Northland.

A copy of Exhibit D to the Petition, amended to exclude Northland from the list of areas for which redefinition is requested, is attached hereto. An amended version of Exhibit C is also provided to reflect Northland's inclusion among rural ILEC areas in which RCC seeks immediate designation.

II. Correction of Exhibit C – Rural ILEC Areas in Which RCC Seeks Immediate Designation

² Western Wireless Corp., Petition for Designation as an Eligible Telecommunications Carrier in the State of Wyoming, 16 FCC Rcd 48, 59 n.71 (2000) ("Western Wireless"), recondenied, 16 FCC Rcd 19144 (2001).

³ RCC Minnesota, Inc., Request for Designation as Eligible Telecommunications Carrier – Petition to Extend ETC Service Area, Docket No. 2002-344, Order (Maine PUC, June 2, 2005).

⁴ Indeed, the only way RCC could have any possibility of cream-skimming in Northland's service territory would be if the Commission did *not* grant RCC's Petition in New Hampshire.

As originally filed, Exhibit C to the Petition did not include wire center (CLLI) codes for the listed wire centers. Accordingly, RCC has included CLLI codes in the attached amended version of Exhibit C.

III. Pages Missing From Document Appearing on ECFS

RCC filed the original and required number of copies of the Petition with the Secretary's Office on March 12, 2004. However, the filing was not acknowledged and posted on the Commission's Electronic Comment Filing System ("ECFS") until May 14, 2004. Although RCC's original paper filing included all pages, it recently came to RCC's attention that the version appearing on ECFS is missing three pages and does not include the map attached as Exhibit A. In response to Staff's request, a complete copy of the Petition is attached hereto, along with the map provided as Exhibit A.⁵

Should you have questions about the information provided above or the attached materials, please call.

Sincerely,

Constilión .

David A. LaFuria

Counsel for RCC Minnesota, Inc.

and RCC Atlantic, Inc.

cc: Mark Seifert, Esq. Pam Slipakoff, Esq.

⁵ Other than the map, all of the exhibits to the Petition appearing on ECFS included all pages. Accordingly, this Supplement will not include copies of Exhibits B through I.